

Mr. Dennis Hughes
Pactiv Corporation
1411 Pidco Drive
Plymouth, Indiana 46563

Re: **099-15185-00028**
Third Administrative Amendment to
Part 70 099-5969-00028

Dear Mr. Hughes:

Pactiv Corporation was issued Part 70 operating permit T099-5969-00028 on June 28, 1999 for a stationary packaging materials manufacturing plant. A letter requesting corrections to second administrative amendment 099-13841-00028, issued on April 10, 2001 and first significant source modification 099-13908-00028, issued on October 4, 2001, was received on November 16, 2001.

Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

1. Second Administrative Amendment 099-13841-00028, Condition D.1:

During the second amendment review, IDEM inadvertently placed the original Title V blowing agent usage rate of 1429.8 tons per 12 month period in the amendment. The First Significant Permit Modification 099-11161-00028, issued on November 4, 1999, established an increased input blowing agent usage rate of 3500 tons per twelve months, rolled on a monthly basis. Pactiv requests that this error be corrected.

To incorporate the correct language, Condition D.1.1 is amended as follows:

D.1.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The input of blowing agent for the entire source shall be limited to ~~1429.8~~ **3,500** tons per twelve (12) month period, rolled on a monthly basis. This ~~production input~~ limitation ~~is~~ **shall result in** equivalent to VOC emissions of 249 tons per year, rolled on a monthly basis. The VOC potential to emit (PTE) for the entire source shall not exceed 249 tons per year. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.
- (b) During the first twelve (12) months of operation, the input of VOC raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed ~~449.45~~ **291.6** tons per month.
- (c) Any change or modification which may increase the VOC PTE of this source to greater than 250 tons per year, shall require prior approval from IDEM, OAM before such change may occur.

2. First Significant Source Modification 099-13908-00028, Condition A.2:

During the first significant modification review, IDEM made the following errors when drafting the unit description of Condition A.2.

- Condition A.2(1): The thermal oxidizer was incorrectly identified as recuperative when in fact it should be regenerative.
- Condition A.2(2): The thermal oxidizer was incorrectly identified as recuperative when in fact it should be regenerative. In addition the regenerative thermal oxidizer was incorrectly identified as SC-1 when in fact it should be identified as CE04.
- Condition A.2(3): The thermal oxidizer was incorrectly identified as recuperative when in fact it should be regenerative.

To incorporate the correct language, Condition A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary packaging materials manufacturing plant consists of the following emission units and pollution control devices:

- (1) Three (3) profile extrusion lines, identified as PL-1, PL-2, and PL-4 respectively, using one (1) ~~recuperative~~**regenerative** thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each profile extrusion line consists of the following equipment:
- (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
- (2) Two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, respectively. The foam sheet extrusion line identified as SL-1 uses one (1) ~~recuperative~~**regenerative** thermal oxidizer, identified as CE04, as control which exhausts to one (1) stack identified as SC-2. The foam sheet extrusion line identified as SL-2 uses one (1) ~~recuperative~~**regenerative** thermal oxidizer, identified as ~~SC-1~~**CE04**. Each foam sheet line consists of the following equipment:
- (a) One (1) extruder;
 - (b) One (1) foam sheet die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-1.
- (3) One (1) tandem profile extrusion line, identified as PL-3, using one (1) ~~recuperative~~**regenerative** thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3 and consists of the following equipment:
- (a) One (1) extruder;
 - (b) One (1) foam profile die;

- (c) One (1) curing chamber; and
- (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.

.....

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SDF

cc: File - Marshall County
Marshall County Health Department
Northern Regional Office
Air Compliance Section Inspector Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Pactiv Corporation
1411 Pidco Drive
Plymouth, Indiana 46563**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-5969-00028	Date Issued: June 28, 1999
First Minor Source Modification No.: 099-10880-00028	Date Issued: May 19, 1999
First Significant Permit Modification No.: 099-11161-00028	Date Issued: November 4, 1999
Second Significant Permit Modification No.: 099-11177-00028	Date Issued: October 18, 1999
First Administrative Amendment No.: 099-11469-00028	Date Issued: November 4, 1999
First Minor Permit Modification No.: 099-12283-00028	Date Issued: July 11, 2000
Second Administrative Amendment No.: 099-13841-00028	Date Issued: April 10, 2001
Third Administrative Amendment No.: 099-15185-00028	Affected Pages: 4, 5, 6, and 29

Issued by:
Paul Dubenetzky, Branch Chief
Office of Air Quality

Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary packaging materials manufacturing plant.

Responsible Official:	Dennis Hughes
Source Address:	1411 Pidco Drive, Plymouth, Indiana 46563
Mailing Address:	1411 Pidco Drive, Plymouth, Indiana 46563
General Source Phone Number:	219-936-7065
SIC Code:	3086
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary packaging materials manufacturing plant consists of the following emission units and pollution control devices:

- (1) Three (3) profile extrusion lines, identified as PL-1, PL-2, and PL-4 respectively, using one (1) regenerative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each profile extrusion line consists of the following equipment:
 - (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
- (2) Two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, respectively. The foam sheet extrusion line identified as SL-1 uses one (1) regenerative thermal oxidizer, identified as CE04, as control which exhausts to one (1) stack identified as SC-2. The foam sheet extrusion line identified as SL-2 uses one (1) regenerative thermal oxidizer, identified as CE04. Each foam sheet line consists of the following equipment.
 - (a) One (1) extruder;
 - (b) One (1) foam sheet die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-1.
- (3) One (1) tandem profile extrusion line, identified as PL-3, using one (1) regenerative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3

and consists of the following equipment:

- (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
- (4) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
- (5) One (1) extruded polystyrene foam insulation board manufacturing line consisting of the following equipment:
- (a) one (1) existing insulation board extruder (to replace the existing profile extrusion line (ID PL-4)), identified as ES-24, exhausting inside the building;
 - (b) one (1) feed blender, identified as ES-25, with particulate matter emissions controlled by a baghouse, exhausting through one (1) stack identified as V25;
 - (c) one (1) polystyrene fluff bin, identified as ES-51, with particulate matter emissions controlled by a baghouse, exhausting through one (1) stack identified as V51;
 - (d) one (1) reclaim extruder, identified as ES-53, exhausting through one (1) stack identified as S53;
 - (e) one (1) truckload staging operation, identified as ES-58; and
 - (f) four (4) curing towers, together identified as ES-117, exhausting inside the building.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary packaging materials sheet and plank foam manufacturing plant also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (4) Closed loop heating and cooling systems.
- (5) Water based adhesives that are less than or equal to 5% by volume of VOC'S excluding HAP's.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (8) Stationary fire pumps.
- (9) A laboratory as defined in 326 IAC 2-7-1(20)(c).

(10) Other activities or categories not previously identified:

Pactiv Corporation
Plymouth, Indiana
Permit Reviewer: FLL

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Amended By: SDF

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Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only

Lead (Pb) = 0.6ton/year or 3.29 lbs/day

Carbon Monoxide (CO) = 25 lbs/day

Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

- (a) Two (2) bubble pack wrap lines
- (b) Heat seal on bubble pack
- (c) Two (2) Kraft paper package mailer lines
- (d) Plank laminator
- (e) VOC emissions from the customer scrap recycling process
- (f) one (1) virgin resin storage silo, identified as ES-2, exhausting through one (1) stack identified as V2;
- (g) one (1) 30,000 gallon non-VOC (non-HAP) blowing agent storage tank, identified as ES-3;
- (h) one (1) 18,000 gallon HAP blowing agent storage tank, identified as ES-4;
- (i) one (1) reclaim resin storage silo, identified as ES-12, exhausting through one (1) stack identified as V12;
- (j) one (1) railcar receiver bin, identified as ES-15, with particulate matter emissions controlled by a baghouse, exhausting through one (1) stack identified as V15;
- (k) one (1) flexographic water based printer, identified as ES-116, exhausting inside the building.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary packaging materials manufacturing plant is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) Three (3) profile extrusion lines, identified as PL-1, PL-2, and PL-4 respectively, using one (1) recuperative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each profile extrusion line consists of the following equipment:
 - (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber;
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8; and
 - (e) One (1) scrap line with an automated grinder and reclaim, identified as GR-9.
- (2) Two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, respectively. The foam sheet extrusion line identified as SL-1 uses one (1) recuperative thermal oxidizer, identified as CE02, as control which exhausts to one (1) stack identified as SC-2. The foam sheet extrusion line identified as SL-2 uses one (1) recuperative thermal oxidizer, identified as SC-1. Each foam sheet line consists of the following equipment.
 - (a) One (1) extruder;
 - (b) One (1) foam sheet die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-1.
- (3) One (1) tandem profile extrusion line, identified as PL-3, using one (1) recuperative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3 and consists of the following equipment:
 - (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
- (4) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
- (5) Insignificant degreasing operation.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) month period, rolled on a monthly basis. This input limitation shall result in equivalent to VOC emissions of 249 tons per year, rolled on a monthly basis. The VOC potential to emit (PTE) for the entire source shall not exceed 249 tons per year. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.
- (b) During the first twelve (12) months of operation, the input of VOC raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 291.6 tons per month.
- (c) Any change or modification which may increase the VOC PTE of this source to greater than 250 tons per year, shall require prior approval from IDEM, OAM before such change

may occur.